

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

ANGELA DREWITT

Plaintiff

Civil No. **1:23-CV-00850**

VS.

BROOKSHIRE GROCERY CO ET

AL

Defendant

Judge Drell

Magistrate Judge Perez-Montes

PROPOSED AMENDED PLAN OF WORK

On, the following individuals participated in a meeting ☒ by telephone/other electronic means, or ☐ in person during which this Plan of Work was formulated: (*List all parties and their counsel, if any, including e-mail addresses for trial attorneys.*).

Mr. Howard E. Conday, Jr., counsel for plaintiff, Angela Drewitt, 328 St. Denis St., Natchitoches, LA 71457; howard@howardcondaylaw.com

Mr. M. Caldwell Roberts, Jr., counsel for Argel Building Services, 8750 Business Park Dr., Suite 200, Shreveport, LA 71105; colly@msrlaw.com

Mrs. Stacey Smith Melerine, counsel for Nationwide Building Services, Inc. and Brookshire Grocery Company, #1 Sanctuary Blvd., Suite 202, Mandeville, LA 70471; smelerin@travelers.com

Part A

Based on the information now reasonably available, the parties have agreed upon the following:

1. 8-7-2024 Deadline for completion of discovery
2. 8-7-2024 Final date for filing dispositive motions
3. 11-7-2023 Final date for adding parties
4. 11-7-2023 Final date for filing amended pleadings
5. 7-7-2024 Final date for Plaintiff to employ and disclose experts
6. 8-8-2024 Final date for Defendants to employ and disclose experts
7. 7-7-2024 Final date for exchanging reports of Plaintiff's experts
8. 8-8-2024 Final date for exchanging reports of Defendant's experts
9. 10-13-2024 Final date for taking depositions of experts
10. 10-8-2023 Date disclosures under Fed. R. Civ. P. 26(a) were made or will be made

11. Considering the subjects addressed by Fed. R. Civ. P. 26(f), the parties propose the following changes, limitations, or other matters: ☒ NONE; or.

Part B

The following areas of disagreement, issues, or problems have arisen regarding the information set forth in Section A and/or the participation of counsel/unrepresented parties in the Plan of Work process: ☒ NONE; or.

05/09/2024

(Date)

/s/ Stacey Smith Melerine

(Signature)

Stacey Smith Melerine

(Printed Name)

05/09/2024

(Date)

/s/Howard E. Conday, Jr.

(Signature)

Howard E. Conday, Jr.

(Printed Name)

05/15/2024

(Date)

/s/ M. Caldwell Roberts, Jr.

(Signature)

M. Caldwell Roberts, Jr.

(Printed Name)

(Date)

(Signature)

(Printed Name)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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Angela Drewitt
Plaintiff

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VS.
Brookshire Grocery Co., et al
Defendant

Judge Drell
Magistrate Judge Perez-Montes

ORDER

Considering the Proposed Plan of Work submitted herein,

IT IS ORDERED that the Plan of Work be and is hereby accepted and shall become the Scheduling Order in this case, subject to the following modifications:

It appearing to the Court that the provisions of the Plan of Work will be satisfied on _____,
20____,

IT IS FURTHER ORDERED that a pretrial conference be held, in Chambers, on **October 17, 2024 beginning at 1:30 p.m.**

IT IS FURTHER ORDERED that the Clerk of court send out the Civil Case Management Order No. 2 – Pretrial Proceedings.

IT IS FURTHER ORDERED that counsel are to review this Court’s Standing Order – Possession and Use of Electronic Devices in the Courtroom found on our website at www.lawd.uscourts.gov on Judge Dee D. Drell’s forms page.

THUS DONE in Chambers on this _____ day of _____, 2024.

Joseph J.L. Perez-Montes
United States Magistrate Judge